

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Richard A. Foster,	:	Bankruptcy Case No.: 22-21999-JAD
Leanne M. Foster,	:	
	:	Chapter 13
Debtors.	:	
	:	
Richard A. Foster,	:	Document No.: 134
Leanne M. Foster,	:	
	:	Related to Document No.:
Movant,	:	
	:	Related Claim: 32
v.	:	
	:	
U.S. Bank Trust National	:	
Association, as Trustee for	:	
Pad Series IV Trust,	:	
	:	
Respondent.	:	

DEBTORS' DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant with the Amended Notice of Mortgage Payment Change filed on May 14, 2025, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtors that the existing Chapter 13 Plan is sufficiently funded to provide for the proposed change for July 1, 2025.

Debtors' Plan remains sufficient.

Respectfully Submitted,

Date: May 23, 2025

/s/Brian C. Thompson
Brian C. Thompson, Esquire
Attorney for Debtor
PA I.D. # 91197
Thompson Law Group, P.C.
301 Smith Drive, Suite 6
Cranberry Township, PA 16066
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com